

EXHIBIT A

BURSOR & FISHER, P.A.

Neal Deckant (State Bar No. 322946)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-mail: ndeckant@bursor.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

Master File Case No. 5:22-cv-07557-PCP

This document relates to:

All Actions

**PLAINTIFFS' SIXTH SET OF
REQUESTS FOR PRODUCTION**

DEFINITIONS

All undefined terms and phrases should be construed with reason and common sense in attributing ordinary definitions to them and should not be deliberately misconstrued or narrowly construed to supply an evasive answer. Specific definitions are as follows:

1. “DOCUMENTS” is intended to have the broadest meaning permitted, and includes, without limitation all written, typed, electronically recorded or other graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, non-identical copies, preliminary versions or revisions of documents, whether or not completed and drafts and both sides thereof, in any medium whatsoever, including: letters, correspondence, electronic mail, papers, memoranda, contracts, agreements, books, journals, ledgers, statements, reports, studies, bills, billings, invoices, financial statements, financial analyses, worksheets, jottings, projections, notes, abstracts, advertisements, drawings, audits, charges, balance sheets, income statements, checks, diagrams, blueprints, diaries, calendars, logs, recordings, instructions, lists, minutes of meetings, orders, resolutions, telegrams, wires, cables, telexes, faxes, messages, resumes, summaries, tabulations, tallies, statistical analyses, tape recordings, videotapes, and all other writing or tangible things on which any information is recorded or reproduced, and any and all amendments or supplements to all the foregoing, whether prepared by a party or any other PERSON.

2. “LITIGATION DOCUMENTS” means any DOCUMENTS filed by any party or non-party in a META PRIVACY ACTION including, but not limited to, motions, briefs, declarations, letters to the court, expert reports, discovery materials (including deposition transcripts), and fact stipulations, and any exhibits to same.

3. “META PIXEL HEALTHCARE ACTION” means the case *In re Meta Pixel Healthcare Litigation*, 3:2022-cv-03580 (N.D. Cal.).

4. “PERSON” or “PERSONS” includes any natural individual, firm, association, organization, partnership, limited partnership, sole partnership, trust, corporation, or legal or government entity, association, or body.

5. “SANCTIONS MOTIONS” means (a) “Plaintiffs’ Notice of Motion and Rule 37

1 Motion for Sanctions to Enforce Dkt. 275, the Court’s June 13, 2023 Order for Production of
2 Documents Responsive to Requests for Production Nos. 5-7” filed October 3, 2023 in the META
3 PIXEL HEALTHCARE ACTION, *see id.*, ECF No. 323, and “Plaintiffs’ Notice of Motion and
4 Motion for Sanctions Against Meta and For a Hearing to Address Relief” filed December 30, 2024
5 in the META PIXEL HEALTHCARE ACTION. *See id.*, ECF No. 740.

6 **REQUESTS FOR PRODUCTION**

7 56. Unredacted versions of all DOCUMENTS filed in the META PIXEL
8 HEALTHCARE ACTION by any party or non-party relating to the SANCTIONS MOTIONS,
9 including but not limited to the following docket entries: ECF Nos. 323-27;¹ 336-40; 349-50; 353;
10 361; 379-80; 739-40; 747; 754-60; 764; 778; 799-80; 813-14; 822-36; 840-43; 854; 865-77.

11 57. Unredacted versions of any court hearings conducted in the META PIXEL
12 HEALTHCARE ACTION relating to the SANCTIONS MOTION, including but not limited to the
13 court hearings reflected in the following docket entries: ECF Nos. 374; 774; 878.

14 58. Unredacted versions of transcripts of all depositions conducted in the META PIXEL
15 HEALTHCARE ACTION, including any exhibits marked during the depositions.

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¹ For each Docket Entry Plaintiffs seek all exhibits or attachments. For example, in requesting
ECF No. 323, Plaintiffs are also seeking ECF Nos. 323-1, 323-2 and 323-3.

1 Dated: February 27, 2025

BURSOR & FISHER, P.A.

2 By: /s/ Neal J. Deckant
Neal J. Deckant

3
4 Neal Deckant (State Bar No. 322946)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
5 Telephone: (925) 300-4455
6 Facsimile: (925) 407-2700
E-mail: ndeckant@bursor.com

7 **GEORGE FELDMAN MCDONALD, PLLC**

8 Lori G. Feldman (*pro hac vice*)
Michael Liskow (State Bar No. 243899)
Rebecca A. Peterson (State Bar No. 241858)
9 200 Park Avenue, Suite 1700
New York, New York 10166
10 Telephone: (646) 354-6534
lfeldman@4-justice.com
11 mliskow@4-justice.com
rpeterson@4-justice.com

12 **SMITH KRIVOSHEY, P.C.**

13 Joel D. Smith (State Bar No. 244902)
867 Boylston Street, 5th Floor, #1520
14 Boston, MA 02116
Telephone: (617) 377-7404
15 Email: joel@skclassactions.com

16 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

17 Kate M. Baxter-Kauf (*pro hac vice*)
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
18 Telephone: (612) 339-6900
Facsimile: (612) 339-0981
19 kmbaxter-kauf@locklaw.com

20 **THE HODA LAW FIRM, PLLC**

21 Marshal J. Hoda, Esq. (*pro hac vice*)
12333 Sowden Road, Suite B
Houston, TX 77080
22 Telephone: (832) 848-0036
marshal@thehodalawfirm.com

23 **FOSTER YARBOROUGH PLLC**

24 Patrick Yarborough, Esq. (*pro hac vice*)
917 Franklin Street, Suite 220
25 Houston, TX 77002
Telephone: (713) 331-5254
26 patrick@fosteryarborough.com

EMERSON FIRM, PLLC
John G. Emerson (*pro hac vice*)
2500 Wilcrest, Suite 300
Houston, TX 77042
Telephone: (800) 551-8649
jemerson@emersonfirm.com

Attorneys for Plaintiffs

DECLARATION OF SERVICE

I declare under penalty of perjury that on February 27, 2025, I served a true and correct copy of the foregoing **PLAINTIFFS' SIXTH SET OF REQUESTS FOR PRODUCTION** by email on counsel of record in this action.

/s/ Michael Liskow
Michael Liskow

Attorney for Plaintiffs